

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS M. FLOHR d/b/a EMERGING	:	FILE NO. 07 CV 2920 (RWS)
MARKETS GROUP,	:	
	:	ECF CASE
Plaintiff,	:	
	:	
v.	:	
	:	
INTERNATIONAL BUSINESS ASSOCIATES,	:	
LTD.,	:	
	:	
First Defendant,	:	
	:	
INTERNATIONAL BUSINESS ASSOCIATES	:	
HOLDINGS CO., LTD., INTERNATIONAL	:	
BUSINESS ASSOCIATES (USA), INC., JOHN	:	
KEAN, JR., and STANLEY J. BROWNELL,	:	
	:	
Second Defendants,	:	
	:	
HARKEN ENERGY CORPORATION,	:	
	:	
Third Defendant.	:	
-----X		

AFFIDAVIT OF PETER J. PIZZI IN SUPPORT OF MOTION FOR AN ORDER
PERMITTING CONNELL FOLEY LLP TO WITHDRAW AS COUNSEL FOR
DEFENDANTS INTERNATIONAL BUSINESS ASSOCIATES, LTD.,
INTERNATIONAL BUSINESS ASSOCIATES HOLDINGS CO., LTD.,
INTERNATIONAL BUSINESS ASSOCIATES (USA), INC., JOHN KEAN, JR., AND
STANLEY BROWNELL

STATE OF NEW JERSEY)
): ss.
COUNTY OF ESSEX)

PETER J. PIZZI, being duly sworn, deposes and says:

1. On May 3, 2007 Defendants International Business Associates, Ltd., International Business Associates Holdings Co., Ltd., International Business Associates (USA), Inc., John Kean, Jr., and Stanley Brownell (collectively "defendants") and Connell Foley LLP

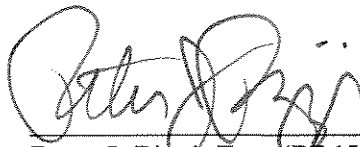
entered into an agreement for Connell Foley LLP to appear for defendants and defend the above-captioned actions.

2. Despite the fact that defendants were completely satisfied with Connell Foley LLP's services, the determination was made that a single law firm should represent all of the parties to reduce legal fees and improve efficiency.

3. Geoffrey Stewart of Jones Day has notified Connell Foley LLP that they have appeared on behalf of defendants in this matter and will defend the above-captioned actions.

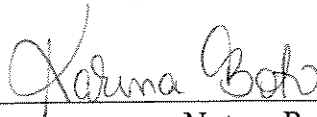
4. Accordingly, Connell Foley LLP makes this motion to withdraw as counsel for defendants International Business Associates, Ltd., International Business Associates Holdings Co., Ltd., International Business Associates (USA), Inc., John Kean, Jr., and Stanley Brownell.

Dated: June 11, 2007



Peter J. Pizzi, Esq. (PP6500)
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Fax: (212) 262-0050

Sworn to before me on
this 11th day of June, 2007



Notary Public

KARINA BOTO
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 3/24/2008